

ESTTA Tracking number: **ESTTA687166**

Filing date: **08/03/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92061745
Party	Defendant inLighten, Inc.
Correspondence Address	INLIGHTEN INC 3370 WALDEN AVENUE DEPEW, NY 14043 UNITED STATES dsaleh@inlighten.net
Submission	Answer
Filer's Name	David J. Saleh, Esq.
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Date	08/03/2015
Attachments	inLighten Answer 92061745.pdf(55981 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re Application of: Qumu Corporation
Cancellation Number 92061745
ESTTA Tracking Number: ESTTA680745
Registration Number: 2957358
Mark: VIDEONET DIRECTOR
Registration Number: 3171173
Mark: VIDEONET DIRECTOR & DESIGN

Qumu Corporation

v.

Answer to Petition for Cancellation

inLighten, Inc.

The Respondent above named, being the owner of the above referenced registered marks, for the Answer to the Petition for Cancellation filed by Petitioner Qumu Corporation herein, alleges as follows:

1. Denies knowledge or information sufficient to form a belief as to the allegations contained in the first, second and third unnumbered sub-paragraphs of the paragraph of the said petition that is titled "The grounds for the cancellation are as follows:", except that Respondent refers to the documents referenced in said sub-paragraphs for their content.
2. Denies the allegations contained in the fourth unnumbered sub-paragraph of the paragraph of the said Petition that is titled "The grounds for the cancellation are as follows:", except that Respondent admits that application for renewal of Registration number 2957358 has not yet been filed, and that Petitioner has petitioned to cancel

Respondent's Registrations. Respondent affirmatively alleges that it intends to file such application for renewal of Registration number 2957358 in the near future.

3. Denies each and every allegation contained in said Petition that is not otherwise controverted herein.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

4. The marks VIDEONET DIRECTOR (Registration Number 2957358) and VIDEONET DIRECTOR AND DESIGN (Registration Number 3171173) are both in use in U. S. commerce for the goods and services listed in the respective Registrations, and have not been abandoned.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

5. The Petition for Cancellation fails to state a claim upon which relief may be granted.

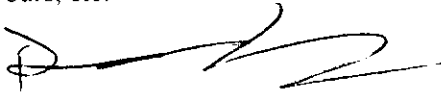
AS AND FOR A THIRD AFFIRMATIVE DEFENSE

6. The Petition for Cancellation is barred by the doctrines of estoppel, laches, acquiescence, waiver, and/or unclean hands.
7. Respondent reserves the right to assert additional defenses as may be warranted by discovery in this matter.

WHEREFORE, Respondent respectfully requests that the Petition for Cancellation herein be dismissed with costs to Respondent. Respondent further requests such other and further relief as may seem just and proper.

Dated: August 3rd, 2015

Yours, etc.



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Attorney for Respondent, inLighten, Inc.

TO: The United States Patent and Trademark Office
Trademark Trial and Appeal Board

Marcia Stolt, Esq.
MOSS & BARNETT, P.A.
Suite 1200; 150 So. Fifth Street
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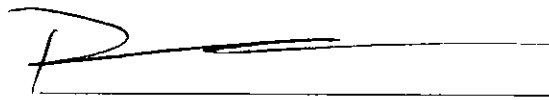
Attorney for Petitioner
Qumu Corporation

CERTIFICATE OF SERVICE

I, David J. Saleh, Esq., hereby certify that a true and correct copy of this Answer to Petition for Cancellation in Cancellation No. 92061745 was served on August 3, 2015 by First Class Mail in a postage pre-paid envelope addressed to:

Marcia Stolt, Esq.
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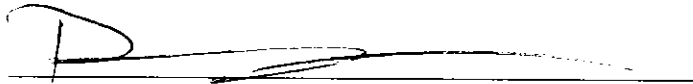
Attorney for Petitioner
Qumu Corporation



David J. Saleh

CERTIFICATE OF FILING

I, David J. Saleh, Esq., hereby certify that this Answer to Petition for Cancellation in Cancellation No. 92061745 is being electronically filed with the Trademark Trial and Appeal Board on August 2, 2015.

A handwritten signature in black ink, appearing to read 'David J. Saleh', is written over a horizontal line.

David J. Saleh